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*Attorneys for Plaintiff and the Proposed Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

SHYRIAA HENDERSON, on behalf  
of herself and all others similarly  
situated,

Plaintiff,

vs.

UNITED STUDENT AID FUNDS,  
INC. D/B/A USA FUNDS,

Defendant.

CASE NO. 3:13-cv-1845-JLS-BLM  
CLASS ACTION

**DECLARATION OF RONALD A.  
MARRON IN SUPPORT OF  
PLAINTIFF SHYRIAA  
HENDERSON'S OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

Hearing date: February 8, 2017  
Time: 1:30 p.m.  
Courtroom: 4A – 4th Floor

Pursuant to 28 U.S.C. § 1746, I hereby declare and state as follows:

1. I, along with my co-counsel Benjamin H. Richman, am counsel of record for Plaintiff and the putative class in this action. I am a member in good standing of the State Bar of California and the United States District Courts for the Northern, Central, Eastern, and Southern Districts of California; and of the United States Court of Appeals for the Ninth Circuit. I am over the age of eighteen and am fully competent to make this declaration. This declaration is based upon my personal knowledge unless otherwise indicated. If called upon to testify to the matters stated herein, I could and would do so competently.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the relevant portions from the Deposition of Kevin W. Tharp, dated March 8, 2016.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant portions from the Deposition of Mark A. Verbrugge, dated February 23, 2016.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the relevant portions from the Deposition Transcript of Shyriaa Henderson, dated June 15, 2016.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the relevant portions from the Deposition Transcript of Jerome Kaufman, dated August 18, 2016.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Notice of Deposition of Plaintiff Shyriaa Henderson, served on May 27, 2016.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Notice of Deposition of Jeffrey A. Hansen, served on August 22, 2016.

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8. Attached hereto as **Exhibit 7** is a true and correct copy of the Re-Notice of Deposition of Jeffrey A. Hansen, served on October 18, 2016.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Transcript of Proceedings – Status Before the Honorable Richard A. Posner from the matter *Johansen v. GVN Michigan, Inc.*, No. 1:15-cv-00912 (N.D. Ill. June 5, 2015).

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on November 30, 2016 at San Diego, California.

By: s/ Ronald A. Marron  
Ronald A. Marron

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